

From: bmueller@clearwire.net  
Sent: Friday, June 09, 2006 10:35 PM  
To: NOP Livestock  
Subject: Pasture Requirements for livestock

Attachments: ATTACHMENT.TXT

Sirs,

I strongly support adopting a minimum DMI from pasture of 30 percent for 120 days. I farm in central Minnesota and have been rotationally grazing my milk cows since 1991. My grazing season begins the end of April and lasts to the end of September. Rarely do I remove the cows from pasture because of weather conditions. If I do it is because of heavy rains and only for a day or two. I do have some sod pastures that hold up well in wet conditions. During extreme heat I have the cows graze during early morning and evening. The DMI of my milk cows during the grazing season averages between 60 and 70 percent from pasture. I have seeded some of my most productive cropland to pasture mixes of white clover and grasses and these have remained my most productive land. Since I have started grazing the cows in 1991 the average age of my cows has increased by three years. I have been able to sell off excess springing heifers. My vet bill has decreased by over 75 percent. I start my young stock on pasture by 6 months of age and it seems the younger they are allowed to graze the better they will do on pasture as mature animals.

A trained certifying agent will be able to measure compliance by observing the quantity and quality of pastures and the accessibility for the livestock.

Consumer perception of an organic livestock is not that of animals housed in buildings or fed in dry lots during the growing season. The cows on milk cartons are always pictured on pasture.

There is a need for a minimum pasture requirement to ensure that all organic farmers do some grazing of their livestock and not just look for ways to get around the standard.

Thank you

Robert Mueller